

Hearing Date: _____, _____, 2007 at ____:____.m.
Oral Argument Requested

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:	§	Chapter 11
	§	
DELPHI CORPORATION, <i>et al.</i>	§	Case No. 05-44481 (RDD)
	§	
Debtors.	§	(Jointly Administered)
	§	

**NOTICE OF JOINT MOTION OF
JP MORGAN CHASE BANK, N.A. AND BRAZEWAY INC. FOR
RELIEF FROM AND RECONSIDERATION OF ORDER MODIFYING
CLAIMS ASSERTING RECLAMATION IDENTIFIED IN DEBTOR'S
TWENTY-FIRST OMNIBUS CLAIMS OBJECTION**

PLEASE TAKE NOTICE that JP Morgan Chase Bank, N.A. and Brazeway Inc. (collectively, the “Movant”) have jointly moved this Court for an Order, pursuant to Fed. R. Bankr. P. 9024 and 3008 and other applicable provisions of the Federal Rules of Bankruptcy Procedure and the Federal Rules of Civil Procedure, granting relief from and reconsideration of that certain Order Modifying Claims Asserting Reclamation Identified in Debtor’s Twenty-First Omnibus Claims Objection (the said Order being **Docket No. 10728**) and in support thereof have filed a Joint Motion (the “Motion”) and Memorandum of Law, together with the Affidavits of Howard J. Grossman, Neelima Velavolu, Bruce N. Elliott and Terry Sheehan.

PLEASE TAKE FURTHER NOTICE that pursuant to the local rules for the Southern District of New York Bankruptcy Court, oral argument on the Movant’s Motion is within the Court’s discretion. If oral argument is ordered by the Court, an additional notice setting forth the hearing date and time will be served on the interested parties.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall be in writing, set forth the name of the objector, the basis for the objection, and the grounds therefore, and be filed with the Court, together with proof of service thereof, and served upon Bruce N. Elliott, Esq., Conlin, McKenney & Philbrick, P.C., 350 South Main Street, Suite 400, Ann Arbor, Michigan 48104-2131.

Dated: November 26, 2007

/s/ Bruce N. Elliott
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